

1 Z. KATHRYN BRANSON, ESQ.,
Nevada Bar #11540
2 LITTLER MENDELSON, P.C.
3960 Howard Hughes Parkway
3 Suite 300
Las Vegas, Nevada 89169.5937
4 Telephone: 702.862.8800
Fax No.: 702.862.8811
5 kbranson@littler.com

6 Attorneys for Defendant
7 AMAZON.COM SERVICES LLC

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 ESTEFANIA CORREA RESTREPO,

11 Plaintiff,

12 v.

13 AMAZON.COM SERVICES LLC; DOES I-X,

14 Defendant.

Case No. 2:25-cv-00119-RFB-DJA

**STIPULATED DISCOVERY PLAN AND
SCHEDULING ORDER**

**(SUBMITTED IN COMPLIANCE WITH
LR 26-1(b))**

15 Defendant, Amazon.com Services LLC (hereinafter “Amazon”), and Plaintiff, Estefania
16 Correa Restrepo (“Restrepo”), by and through their respective attorneys of record, hereby submit
17 this Stipulated Discovery Plan and Scheduling Order pursuant to Federal Rule of Civil Procedure
18 26(f) and Local Rule 26-1(b).

19 **1. Fed. R. Civ. P. 26(a) Initial Disclosures:**

20 Pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule of Court 26-1(a), on
21 February 24, 2025, counsel for Plaintiff, Ruthann Devereaux-Gonzalez, Esq., and counsel for
22 Defendant, Z. Kathryn Branson, Esq. of Littler Mendelson, conducted a meeting to discuss the
23 relevant issues for discovery, possible early resolution of the matter, and other pertinent issues.
24 Pursuant to these discussions, the parties agree that they will submit their initial disclosures on or
25 before **March 17, 2025**.

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1 **2. Discovery Cut-Off Date:**

2 The parties request a discovery period of 180 days from January 24, 2025, the date the
3 Defendant Amazon filed its Answer. Accordingly, all discovery must be completed no later than
4 **Wednesday, July 23, 2025.**

5 **3. Amending the Pleadings and Adding Parties:**

6 The date for filing motions to amend the pleadings or to add parties shall not be later than
7 ninety (90) days prior to the discovery cut-off date and, therefore, not later than **Thursday, April**
8 **24, 2025.**

9 **4. Fed. R. Civ. P. 26(a)(2) Disclosures (Experts):**

10 In accordance with Rule 26(a)(2), initial disclosures identifying experts shall be made sixty
11 (60) days prior to the discovery cut-off date, and therefore, not later than **Tuesday, May 27, 2025,**
12 *[Deadline lands on a Saturday and Monday is a holiday, moved to Tuesday]* and disclosures
13 identifying rebuttal experts shall be made thirty (30) days after the initial disclosure of experts and,
14 therefore, not later than **Thursday, June 26, 2025.**

15 **5. Dispositive Motions:**

16 The parties shall file dispositive motions not more than (30) days after the discovery cut-
17 off date and, therefore, not later than **Friday, August 22, 2025.**

18 **6. Pretrial Order:**

19 If no dispositive motions are filed, and unless otherwise ordered by this Court, the Joint
20 Pretrial Order shall be filed not more than thirty (30) days after the date set for filing dispositive
21 motions and, therefore, not later than **Monday, September 22, 2025** *[Deadline lands on a Sunday,*
22 *moved to Monday].*

23 **7. Fed. R. Civ. P. 26(a)(3) Disclosures:**

24 If no dispositive motions are filed, and unless otherwise ordered by this Court, the parties
25 shall file the disclosures required by Fed. R. Civ. P. 26(a)(3) and any objections thereto with the
26 Pretrial Order pursuant to LR 26-1(b)(6) in the Joint Pretrial Order, not more than thirty (30) days
27 after the date set for filing dispositive motions and, therefore, not later than **Monday, September**
28 **22, 2025** *[Deadline lands on a Sunday, moved to Monday].*

1 **8. Alternative Dispute Resolution:**

2 The parties certify they have met and conferred about the possibility of using alternative
3 dispute-resolution processes including mediation, arbitration and early neutral evaluation. This
4 case is currently set for an Early Neutral Evaluation session before Magistrate Judge Elayna
5 Youchah, to take place on April 24, 2025 and the parties are prepared to attend and negotiate in
6 good faith.

7 **9. Alternative Forms of Case Disposition:**

8 The parties certify they have considered consent to trial by a magistrate judge under 28
9 U.S.C. § 636(c) and Fed.R.Civ.P.73 and the use of the Short Trial Program (General Order 2013-
10 01).

11 **10. Electronic Evidence:**

12 The parties certify they have discussed whether they intend to present evidence in electronic
13 format to jurors for the purposes of jury deliberations. Discussions between the parties will be
14 ongoing as the trial date approaches and they stipulate that they intend to present any electronic
15 evidence in a format compatible with the court's electronic jury evidence display system.

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11. Extensions or Modifications of the Discovery Plan and Scheduling Order:

In accordance with Local Rule 26-3, a stipulation or motion for modification or extension of this discovery plan and scheduling order must be made no later than twenty (21) days before the expiration of the subject deadline.

Dated: February 24, 2025

Dated: February 26, 2025

Respectfully submitted,

Respectfully submitted,

/s/ RuthAnn Devereaux-Gonzalez



JAMES P. KEMP, ESQ.

Z. KATHRYN BRANSON, ESQ.

KEMP & KEMP, ATTORNEYS AT LAW

LITTLER MENDELSON, P.C.

LEON GREENBERG, ESQ.

Attorneys for Defendant

RUTHANN DEVEREAUX-GONZALEZ,
ESQ.

AMAZON.COM SERVICES LLC

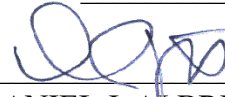
LEON GREENBERG PROFESSIONAL
CORPORATION

Attorneys for Plaintiff

ESTEFANIA CORREA RESTREPO

IT IS SO ORDERED.

Dated: February 28, 2025.



DANIEL J. ALBREGTS

UNITED STATES MAGISTRATE JUDGE

4905-6088-1438.3